

In the Matter of

Amendment of Parts 73 And 74 of the)	
Commission's Rules to Establish Rules)	
For Digital Low Power Television,)	MB Docket No. 03-185
Television Translator, and Television)	
Booster Stations and to Amend Rules For)	
Digital Class A Television Stations)	

COMMENTS OF PIONEER TELEPHONE COOPERATIVE, INC.

Pioneer Telephone Cooperative, Inc ("Pioneer") by its consulting engineers, hereby submits these comments to the Federal Communications Commission ("FCC") in the above captioned proceeding.

Pioneer has had the distinct privilege to win three RSAs in the latest 700 MHz Auction. The licenses are currently free from interference and they plan to provide services to the public in the near future. Pioneer writes these comments in concerns for the direction the FCC is looking, which will greatly impact their current implementation plans and desires to obtain additional frequencies to serve the rural public in the future.

Pioneer's concerns are detailed in the following comments:

1. Interference Issues:

The FCC Notice of Proposed Rule Making to allow Television Translator stations and LPTV stations secondary status and the use of frequencies which potentially could cause adjacent channel interference, is inconsistent with the past FCC coordination planning. Why not exclude these channels from the Television Translator and LPTV available channel list especially since the rural area has unused channels at present.

2. Secondary Status

The FCC needs to make sure the Television Translator and LPTV stations are well informed that their stations are secondary to the Lower 700 MHz licensees. Any movement by the rural 700 MHz Licenses to establish a network will become greatly hampered when a Television Translator or LPTV station tries to remain in operation and not move to other approved frequencies.

Conclusion

For the reasons listed above Pioneer requests the FCC reverse the position taken in the NPRM and prohibit digital Television Translator Stations and LPTV stations from operating in the Lower 700 MHz frequencies.

Respectfully Submitted,

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